

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Mahmoud Khalil et. al.,

Plaintiff,

v.

Columbia University and the Trustees of
Columbia University, et. al.,

Defendants.

No. 1:25-cv-02079-AS

Hon. Judge Arun Subramanian

**NOTICE OF MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 65 and 57, Petitioner hereby moves this Court to issue a Temporary Restraining Order and Preliminary Injunction enjoining University Defendants from providing their personally identifying information and student disciplinary records to the Committee on Education and Workforce in the U.S. House of Representatives, the federal defendants from coercing the University Defendants to punish and suppress Plaintiffs' speech and associations, as well as a declaratory judgment establishing the unlawfulness of Defendants' conduct, pending further proceedings before this Court. In support of this motion, Petitioner respectfully submits a Memorandum of Law and supporting Declarations and Exhibits.

As detailed on pages in the accompanying Memorandum of Law and supporting materials, the Committee on Education and Workforce in the U.S. House of Representatives sent a February 13, 2025, letter to Katrina Armstrong, Interim President of Columbia University, as well as David Greenwald and Claire Shipman, co-chairs of the Trustees of Columbia University demanding that

Columbia University produce *all* of the student disciplinary records related to eleven separate incidents on campus, likely encompassing records of over 100 students, by February 27, 2025.

On March 2, 2025, undersigned counsel contacted Columbia University's Office of the General Counsel, and Columbia University's private counsel at Hecker & Fink to notify them that Plaintiffs anticipated filing a civil complaint and a motion for emergency relief in Plaintiffs' case. Immediately thereafter, Plaintiffs, through counsel, commenced this civil action. Plaintiffs respectfully seek the Court's intervention to enter the proposed order as a temporary restraining order.

On March 13, 2025, the federal agency defendants made a series of demands to Columbia University to punish and suppress the speech and association of Plaintiffs and others holding their views. This led Plaintiffs to amend their complaint on March 19, 2025 and seek emergency relief as well.

ECF-stamped copies of this notice of motion and the memorandum of law in support of this motion, and the unsealed supporting materials will be provided to Defendants' counsel via email upon filing.

Dated: March 19, 2025
New York, NY

Respectfully submitted,

/s/ Amy E. Greer
Amy E. Greer (NY 5910179)
Dratel & Lewis
29 Broadway, Suite
1412
New York, NY 10006
(212) 732-8805
agreer@dratellewis.com

**CAIR NATIONAL
LEGAL DEFENSE FUND**

/s/Lena Masri

Lena Masri

Gadeir Abbas (VA 81161)*

453 New Jersey Ave SE

Washington, DC 20003

(202) 742-6420

**COUNCIL ON AMERICAN ISLAMIC
RELATIONS – NEW YORK**

/s/Lamya Agarwala

Lamya Agarwala (NY 5736061)

80 Broad Street, 5th Floor

New York, NY 10009

(646) 665-7599

lagarwala@cair.com

Jonathan Wallace

/s/ Jonathan Wallace

Jonathan Wallace (NY 1733757)

PO #728

Amagansett NY 11930

(917) 359-6234

jonathan.wallace80@gmail.com